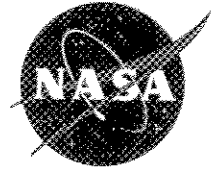


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



November 30, 2011

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the NIA & AIAA luncheon on December 9, 2011

On December 9, 2011, the National Institute of Aerospace (NIA) and the American Institute of Aeronautics and Astronautics (AIAA), both non-profit organizations under section 501(c)(3) of the Internal Revenue Code, in conjunction with the Boeing Company will host a morning coffee and lunch during the NASA Future Forum at the Museum of Flight in Seattle, Washington. The morning coffee will be from 8 AM - 9 AM, and the lunch will be from 1 PM - 2 PM.

Approximately 200 people are expected to attend. The estimated cost of the event including all food and beverages is \$19.00 per person. The morning coffee and lunch will be attended by State and local officials, representatives of the aerospace industry, non-profit organizations, academia, professional society members, astronauts, NASA personnel, and other Federal agencies. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. The event will be co-located with the NASA 2011 Future Forum and will provide additional opportunities to discuss innovation. Attendance at the event will provide NASA attendees with the opportunity to discuss science and exploration related issues with other guests. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests.

A handwritten signature in dark ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone